

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CR# 03-10362 PBS

SEAN D. STARK

DEFENDANT'S MOTION FOR TRANSPORTATION FROM
ARIZONA TO MASSACHUSETTS

Request is hereby made on behalf of Sean D. Stark, for non-custodial transportation to be arranged by the United States Marshal at government expense pursuant to 18 U.S.C. §4285, so he can attend his suppression hearing in Boston.

Such request is by his attorney, Melvin Norris, who has been appointed to represent Sean D. Stark, and assigns as reason therefore the following:

1. The defendant is indigent and without funds to pay for transportation and expenses to come to his suppression hearing, and has been found by the Court to be indigent.
2. The defendant resides in Arizona, and requires air transportation to come to and return from his Suppression Hearing in Boston.
3. The defendant is charged with Conspiracy to Distribute Marijuana and to Possess with Intent to Distribute Marijuana, as well as Possession with Intent to Distribute Marijuana.
4. The case is to be scheduled for a Suppression Hearing on May 18, 2004.
5. The defendant further requests that he be permitted to travel to Boston from Tucson, Arizona, on May 17, 2004, so he may confer with counsel regarding his suppression hearing.

6. Justice dictates that this motion be allowed.

By his attorney,

Date: May 11, 2004

/s/ Melvin Norris
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